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January 30, 2020

**BY ECF**

Hon. Gregory H. Woods  
United States District Judge  
United States District Court for the Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

Re: *Shatsky, et al. v. Palestine Liberation Organization, et al.*  
1:18-cv-12355-GHW

Dear Judge Woods:

We represent the plaintiffs in the above-referenced action, and we respectfully submit this supplemental joint status letter pursuant to the Court's Order of August 22, 2019 (DE 20), and further to our status letters of May 20, 2019 (DE 16) and August 22, 2019 (DE 19).

As discussed in our prior status letters (DE 16; DE 19), plaintiffs filed this case as a "protective action" because of uncertainties relating to venue and/or personal jurisdiction in plaintiffs' proceedings against the instant defendants in the District of Columbia. Plaintiffs therefore requested in their prior letters (with defendants' consent) that this action remain stayed pending the appeal in *Shatsky I* (No. 17-7168 (D.C. Cir.)), and the disposition of the parallel action in *Shatsky II* (Civ. No. 18-3141 (D.D.C.)).

Oral argument in the appeal in *Shatsky I* (No. 17-7168 (D.C. Cir.)) was held on September 9, 2019. Thus, that appeal should be resolved relatively soon.

Accordingly, and for the other reasons set forth in their prior letters, plaintiffs respectfully request that this action continue to be stayed pending the resolution of the D.C. proceedings.

Defendants' counsel, Mitchell Berger, Esq. and Gassan Baloul, Esq., of Squire Patton Boggs, have authorized the undersigned to inform the Court that they consent to the continued stay of this action pending the proceedings in the District of Columbia.

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January 30, 2020

Page 2 of 2

We thank the Court for its consideration.

Respectfully,



Robert J. Tolchin

Cc: Mitchell Berger, Esq.  
Gassan Baloul, Esq.